

Exhibit F

Neufeld, Courtney A.

From: jgriffith@ziliak.com
Sent: Thursday, May 30, 2024 11:15 AM
To: Vander Stoep, Kari L.; 'Nicole Wing'; 'Ashley Pendleton'
Cc: Gammell, Ashley E.M.; Smith, Brian J.
Subject: RE: Bodum v. Starbucks - follow up on discovery issues [KLG-USW_ACTIVE01.FID1518974]

This Message Is From an External Sender

This message came from outside your organization.

Hi Kari,

Let's plan for Monday at 2pm CT/12pm PT. Thank you.

Jim

James E. Griffith

He/him/his

Ziliak Law, LLC

141 W. Jackson Blvd. Suite 4048 | Chicago, IL 60604

Phone (direct): 312.423.7832

Phone (office): 312.462.3350

Email: jgriffith@ziliak.com

From: Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>

Sent: Friday, May 24, 2024 3:10 PM

To: jgriffith@ziliak.com; 'Nicole Wing' <nicole.wing@bodum.com>; 'Ashley Pendleton' <apendleton@ziliak.com>

Cc: Gammell, Ashley E.M. <Ashley.Gammell@klgates.com>; Smith, Brian J. <Brian.J.Smith@klgates.com>; Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>

Subject: RE: Bodum v. Starbucks - follow up on discovery issues [KLG-USW_ACTIVE01.FID1518974]

Hi James –

I wanted to touch base with you on two issues:

1. Starbucks document production is not going to be served today due to some technical challenges we're having. We will serve it next week.
2. With respect to the meet and confer regarding the additional search term that Bodum requested, I would like to propose that we schedule the meet and confer on Monday, June 3, rather than next week in order to ensure that I have sufficient information regarding the volumes associated with the proposed term and potential alternatives. Here is my availability on Monday, June 3:
 - a. 9 am to 10 am PDT
 - b. 11 am to 4 pm PDT

Thank you.

Kari

K&L GATES

Kari Vander Stoep | Partner
K&L Gates LLP
925 Fourth Avenue
Suite 2900
Seattle, WA 98104
Phone: 206-370-7804
Pronouns: she/her/hers
kari.vanderstoep@klgates.com
www.klgates.com

From: Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>
Sent: Wednesday, May 22, 2024 1:58 PM
To: jgriffith@ziliak.com; 'Nicole Wing' <nicole.wing@bodum.com>; 'Ashley Pendleton' <apendleton@ziliak.com>
Cc: Gammell, Ashley E.M. <Ashley.Gammell@klgates.com>; Smith, Brian J. <Brian.J.Smith@klgates.com>; Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>
Subject: RE: Bodum v. Starbucks - follow up on discovery issues [KLG-USW_ACTIVE01.FID1518974]
Importance: High

Hi James –

I adopted all but one of the changes in the draft of the joint status report that you sent. Starbucks does not use apostrophes in its name even when the use of Starbucks is possessive in a sentence. Please see the attached redline that rejects Bodum's proposal to make Starbucks possessive.

Please confirm that we may proceed with filing.

We are available on Tuesday, May 28, during these windows:

- 9 am to noon PDT
- 1 pm to 5 pm PDT

On Wednesday, May 29, we are available during these windows:

- 10 am to 11 am PDT
- 12 pm to 5 pm PDT

Please let us know what time works for a meet and confer to discuss Bodum's requested search term.

Kari

K&L GATES

Kari Vander Stoep | Partner
K&L Gates LLP
925 Fourth Avenue
Suite 2900
Seattle, WA 98104
Phone: 206-370-7804
Pronouns: she/her/hers
kari.vanderstoep@klgates.com
www.klgates.com

From: jgriffith@ziliak.com <jgriffith@ziliak.com>

Sent: Wednesday, May 22, 2024 1:41 PM

To: Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>; 'Nicole Wing' <nicole.wing@bodum.com>; 'Ashley Pendleton' <apendleton@ziliak.com>

Cc: Gammell, Ashley E.M. <Ashley.Gammell@klgates.com>; Smith, Brian J. <Brian.J.Smith@klgates.com>

Subject: RE: Bodum v. Starbucks - follow up on discovery issues [KLG-USW_ACTIVE01.FID1518974]

Hi Kari,

Attached are our suggested edits to the draft Joint Status Report. Please let us know if you have any questions about any of them.

With regard to the proposed additional search term, the heart of the lawsuit relates to who Starbucks has been communicating or working with in connection with the sales of French press coffee makers apart from Bodum. Given the stakes in this litigation, Bodum is entitled to discovery on all documents bearing on these issues. We further note that Bodum, with far fewer resources at its disposal than Starbucks, has already reviewed over 100,000 documents in connection with this litigation. We are available next week to discuss this issue further -- please let us know days and times that work for you to meet and confer.

James E. Griffith

He/him/his

Ziliak Law, LLC

141 W. Jackson Blvd. Suite 4048 | Chicago, IL 60604

Phone (direct): 312.423.7832

Phone (office): 312.462.3350

Email: jgriffith@ziliak.com

From: Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>

Sent: Wednesday, May 22, 2024 2:33 PM

To: jgriffith@ziliak.com; Nicole Wing <nicole.wing@bodum.com>; Ashley Pendleton <apendleton@ziliak.com>

Cc: Gammell, Ashley E.M. <Ashley.Gammell@klgates.com>; Smith, Brian J. <Brian.J.Smith@klgates.com>

Subject: Re: Bodum v. Starbucks - follow up on discovery issues [KLG-USW_ACTIVE01.FID1518974]

Hi James - I wanted to check on the email below and finalizing and filing the status report today.

Best,
Kari

On May 21, 2024, at 3:27 PM, Vander Stoep, Kari L. <kari.vanderstoep@klgates.com> wrote:

James –

Thank you for your email and the provisional approval of the custodians and search terms for Bodum's RFPs 5 – 8. Attached is a draft of the Joint Status Report that is due tomorrow. We look forward to your feedback.

Starbucks believes that the additional search string proposed by Bodum for RFPs 5 and 6 will produce a huge volume of non-responsive documents ("((French or coffee or brew or travel) w/5 press) but not Bodum"). Requiring Starbucks to review any document from 2008 to the present from over 50 custodians that has the word "press" within 5 words of "French," "coffee," "brew," or "travel" is a wild goose chase that is simply not proportional to the needs of this case and likely to result in a huge volume of documents that are not responsive to:

RFP 5: All documents related to Starbucks consideration of, or discussion about, whether selling a non-Bodum product would or may violate the 2008 Agreement.

RFP 6: All documents (dated after the execution of the 2008 Agreement) related to Starbucks's consideration of, or discussion about, whether a non-Bodum French press product would be sold.

In order to avoid the type of document collection and review for RFPs 5 and 6 that will result from Bodum's proposed search, Starbucks identified the names of non-Bodum suppliers who were or may have been considered as a supplier of French press products from 2008 to the present. Starbucks developed its search terms with these supplier names as an additional qualifier to avoid the unreasonable expanse of documents that will be generated by Bodum's proposed term.

Starbucks respectfully requests that Bodum withdraw this additional search term request. If it will not withdraw this proposal, please let us know when you are available for a meet and confer on either Tuesday, May 28 or Wednesday, May 29. Please note that we are stalled from proceeding with uploading and reviewing the results of the searches provisionally approved by Bodum until this issue is resolved. As noted in my email below, it is extremely expensive for Starbucks to upload entire outlook accounts when the time frame for this case covers more than 16 years and over 50 custodians. For many of the custodians, we will only be uploading to the vendor the search term hits and must avoid conducting multiple searches and uploads.

Thank you.

Kari

K&L GATES

Kari Vander Stoep | Partner
K&L Gates LLP
925 Fourth Avenue
Suite 2900
Seattle, WA 98104
Phone: 206-370-7804
Pronouns: she/her/hers
kari.vanderstoep@klgates.com
www.klgates.com

From: jgriffith@ziliak.com <jgriffith@ziliak.com>
Sent: Tuesday, May 21, 2024 9:18 AM
To: Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>; 'Nicole Wing' <nicole.wing@bodum.com>; 'Ashley Pendleton' <apendleton@ziliak.com>
Cc: Gammell, Ashley E.M. <Ashley.Gammell@klgates.com>
Subject: RE: Bodum v. Starbucks - follow up on discovery issues [KLG-USW_ACTIVE01.FID1518974]

Hi Kari,

To follow up on the specific items raised in your correspondence below, you may note the following in the joint report:

1. Bodum is preparing supplemental discovery responses with regard to all of the specific document requests and interrogatories that Starbucks identified in its February 22 letter. We anticipate serving those supplemental responses by June 1, 2024.
2. Bodum will provide a supplemental document production on or before June 1, 2024. This production will consist of all additional responsive documents that have been identified, except for those that remain in dispute.
3. The list of individual custodians appears acceptable.
4. The list of search terms appears acceptable, as well, except that Bodum requests that the following search be added to the proposed search terms applicable to RFPs 5 and 6: “((French or coffee or brew or travel) w/5 press) but not Bodum”
5. Bodum reserves the right to pursue further discovery of documents held by other Starbucks custodians or to request the use of additional search terms if it believes after reviewing Starbucks’ document production that additional responsive documents likely exist that were not captured by the agreed search terms and custodian list.

Please let us know if you have any questions or concerns regarding any of the foregoing items.

Sincerely,

James E. Griffith
He/him/his
Head of Intellectual Property, Entertainment, and Media Practice
[Ziliak Law, LLC](#)
141 W. Jackson Blvd. Suite 4048 | Chicago, IL 60604
Phone (direct): 312.423.7832
Phone (office): 312.462.3350
Email: jgriffith@ziliak.com

From: Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>
Sent: Monday, May 20, 2024 10:16 AM
To: Nicole Wing <nicole.wing@bodum.com>; jgriffith@ziliak.com; 'Ashley Pendleton' <apendleton@ziliak.com>
Cc: Gammell, Ashley E.M. <Ashley.Gammell@klgates.com>; Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>
Subject: FW: Bodum v. Starbucks - follow up on discovery issues [KLG-USW_ACTIVE01.FID1518974]

Hi Nicle, James, and Ashley –

I wanted to check with you regarding the message below given that we have a joint status report that is due on Wednesday.

Thanks –

Kari



Kari Vander Stoep | Partner
K&L Gates LLP
925 Fourth Avenue
Suite 2900
Seattle, WA 98104
Phone: 206-370-7804
Pronouns: she/her/hers
kari.vanderstoep@klgates.com
www.klgates.com

From: Gammell, Ashley E.M. <Ashley.Gammell@klgates.com>
Sent: Thursday, May 16, 2024 11:17 AM
To: Nicole Wing <nicole.wing@bodum.com>; James Griffith <jgriffith@ziliak.com>; Ashley Pendleton <apendleton@ziliak.com>
Cc: Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>
Subject: RE: Bodum v. Starbucks - follow up on discovery issues [KLG-USW_ACTIVE01.FID1518974]

Nicole, James, and Ashley –

As you may recall, Starbucks and Bodum must file a joint status report on Wednesday, May 22, addressing the following issues:

(1) the current status of discovery, including what progress has been made, whether the parties are aware of any discovery disputes that will require the Court's involvement, and whether the parties are aware of any reason why they will not be able to complete fact discovery by the 9/16/2024 deadline; (2) the parties' views regarding prospects for settlement and whether the parties request a referral to the magistrate judge for a settlement conference; and (3) whether the parties require a telephonic status hearing and, if so, what matters the parties feel it would be helpful to discuss with the Court.

In preparation for drafting this joint status report with you over the next week, we wanted to provide you an update on Starbucks document collection and review efforts and seek a similar update on Bodum's discovery.

1. **Bodum's Discovery Deficiencies:** Per the email below, we sought an update from you on February 22 on Bodum's positions and efforts to address the discovery deficiencies identified by Starbucks. We have not received a response yet nor any supplemental document productions. Please provide an update as soon as possible.
2. **Starbucks Document Collections and Productions:** Since the parties' settlement negotiations stalled in April, Starbucks has been working on its document collections and review:
 1. *Upcoming Document Production:* We anticipate serving another document production on Friday, May 24.

2. *Search Terms for Bodum's RFPs 5 & 6:* We developed the search terms and custodian list in the attached Word document to search for documents responsive to Bodum's RFPs 5 & 6:

RFP 5: All documents related to Starbucks's consideration of, or discussion about, whether selling a non-Bodum product would or may violate the 2008 Agreement.

RFP 6: All documents (dated after the execution of the 2008 Agreement) related to Starbucks's consideration of, or discussion about, whether a non-Bodum French press product would be sold.

Pursuant to the parties' discovery deficiency discussions in October, November, and December 2023 (see attached letters and emails), Starbucks is limiting its search to discussions regarding non-Bodum French press products. As you may recall from the parties' previous litigation, it is expensive for Starbucks to export entire email accounts to its discovery vendor given the number of custodians involved with this case and the very long time period for which we are searching for documents. As a result, for many of the custodians, we are taking the approach of searching through M365 and only exporting data with search term hits to the discovery vendor. Please confirm that you are comfortable with the proposed search terms and custodians for RFPs 5 & 6. We have conducted some test searches, and the search terms are producing a significant but not unreasonable level of hits. We would appreciate your approval to proceed with these custodians and search terms before we proceed with exporting data to the discovery vendor.

3. *Search Terms for Bodum's RFPs 7 & 8:* We developed the search terms and custodian list in the attached Word document to search for documents responsive to Bodum's RFPs 7 & 8:

RFP 7: Documents sufficient to show what designs Starbucks believes Bodum has proposed to it since the execution of the 2008 Agreement.

RFP 8: For the products in Request No. 7, documents sufficient to show the number of units sold and the price that Starbucks paid for the products.

Again, pursuant to the parties' discovery deficiency discussions, Starbucks is limiting its search to Bodum French press products and proposals. We developed the search terms and custodian list based on the attached emails from Nicole Wing on February 9 and March 12 (note that our custodian list is broader than what was suggested by Nicole). Please confirm that you are comfortable with the proposed search terms and custodians for RFPs 7 & 8. Similar to what we did with respect to RFPs 5 & 6, we have conducted some test searches, and the search terms are producing a significant but not unreasonable level of hits. We would appreciate your approval to proceed with these custodians and search terms before we proceed with exporting to the discovery vendor.

Note that these proposals should not be construed as waiver of Starbucks written objections to Bodum's discovery requests.

Best,
Ashley and Kari



Ashley Gammell (she/her)
Partner
K&L Gates LLP
206.370.8095
Ashley.Gammell@klgates.com

From: Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>
Sent: Thursday, February 22, 2024 11:31 AM
To: Nicole Wing <nicole.wing@bodum.com>; James Griffith <jgriffith@ziliak.com>; Ashley Pendleton <apendleton@ziliak.com>
Cc: Gammell, Ashley E.M. <Ashley.Gammell@klgates.com>; Vander Stoep, Kari L. <kari.vanderstoep@klgates.com>
Subject: Bodum v. Starbucks - follow up on discovery issues [KLG-USW_Active01.FID1518974]

Hi Nicole,

As a follow up to our telephone conversation on February 9, attached is the deficiency correspondence exchanged between the parties. As of November 21, 2023, Bodum agreed to consider and advise on its position with respect to each of the issues raised in Starbucks November 1 letter, including Starbucks interrogatories, document requests, and requests for admission concerning:

1. The Third Amendment to the MPA;
2. Any claims by Bodum against Espro regarding the Espro Press;
3. The factual basis for Bodum's contentions in Paragraphs 18-21 of the Amended Complaint;
4. Documents and communications referencing the 2008 Settlement Agreement;
5. Individuals consulted to draft the response to each interrogatory propounded by Starbucks; and
6. Bodum's 1991 Stock Purchase Agreement and La Cafetiere's right to market products similar to the Chambord as it relates to Starbucks affirmative defense of unilateral or mutual mistake.

Additionally, with respect to Bodum Interrogatory 2 and RFPs 7-8, Starbucks has taken the list of products identified in your February 9 email and is in the process of devising search terms and identifying potential document custodians. You mentioned that Bodum would also provide a list of Starbucks partners Bodum interacted with regarding the sale of these products to Starbucks. To the extent you can identify these individuals, it would likely assist Starbucks in more quickly identifying and collecting responsive documents.

Best,
Kari and Ashley



Kari Vander Stoep | Partner
K&L Gates LLP
925 Fourth Avenue
Suite 2900
Seattle, WA 98104
Phone: 206-370-7804

Pronouns: she/her/hers

kari.vanderstoep@klgates.com

www.klgates.com

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<05-22-24 - Joint Status Report - Bodum v Starbucks(507746824.1).docx>

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